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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ROSALIA RAZO,
Plaintiff,
vs.
KILOLO KIJAKAZI, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:21-cv-01802-BAK

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from May 31, 2022 to August 1, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. First, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022, and is dealing with post-operation pain and the

1 secondary effects of medications; and as a result, is working short periods
2 throughout the day with significant breaks throughout. Counsel will also undergo
3 12 weeks of physical therapy, four days a week.

4 Secondly, as this Court is well aware, Social Security case filings in federal
5 court increased due to a combination of factors including an increase in appeals
6 council decisions and an increase in hearings at the administrative levels. Then, as
7 a result of the pandemic, shelter-in-place mandates, and Court ordered Stays, there
8 were significant delays in producing transcripts. In recent months, Counsel for the
9 Plaintiff has received a greater-than-usual number of Answers and Certified
10 Administrative Records from defendant including over 56 cases in February and
11 March of 2022.

12 For the week of May 23, 2022 through the end of May 2022, Counsel for
13 Plaintiff has seven merit briefs, and several letter briefs and reply briefs. For the
14 month of June 2022, there are over 45 merit briefs currently scheduled.

15 Defendant does not oppose the requested extension. Counsel apologizes to
16 the Defendant and Court for any inconvenience this may cause.

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18 Respectfully submitted,

19 Dated: May 21, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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21 By: /s/ Jonathan Omar Pena
22 JONATHAN OMAR PENA
23 Attorneys for Plaintiff

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25 Dated: May 23, 2022

26 PHILLIP A. TALBERT
27 United States Attorney
28 PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

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2 By: * Andrea Banks, Esq.
3 Andrea Banks, Esq.
4 Special Assistant United States Attorney
5 Attorneys for Defendant
6 (*As authorized by email on May 23, 2022)
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ORDER

Pursuant to stipulation, and good cause appearing, Plaintiff's request for an extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before August 1, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: June 16, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE